

**IN THE DRAWINGS****I. FIG. 7**

FIG. 7 has been amended to replace the word "editting" in element 720 with "editing".

**II. FIG. 14**

FIG. 14 has been amended to delete the reference numerals "1404", "1406", "1434" and "1436". In addition, the redundant reference numeral "1412", referring to the element labeled "KEYBOARD", has been deleted.

## REMARKS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are directed to non-statutory subject matter under the provisions of 35 U.S.C. §101 or anticipated under the provisions of 35 U.S.C. §102. Thus, the Applicants believe that all of the presented claims are in condition for allowance.

### I. OBJECTION TO THE DRAWINGS

The Examiner objects to the drawings for allegedly failing to comply with 37 CFR 1.84(p)(5). Specifically, the Examiner alleges that a plurality of reference numerals included in the drawings are not mentioned in the description. In response, the Applicants have amended the drawings in order to more clearly illustrate aspects of the present invention.

In particular, FIG. 14 has been amended to delete the reference numerals "1404", "1406", "1434" and "1436". In addition, the redundant reference numeral "1412", referring to the element labeled "KEYBOARD", has been deleted.

Moreover, the Applicants have amended element 720 of FIG. 7 to replace the misspelled word "EDITING".

Replacement sheets for FIG. 7 and FIG 14, in which these amendments have been incorporated, are included herewith. Accordingly, the Applicants respectfully request that the objection to the drawings be withdrawn.

### II. OBJECTION TO THE SPECIFICATION

#### **A. Abstract**

The Examiner objects to the Abstract. Specifically, the Examiner objects to the use of a paragraph number in the Abstract, and to the absence of a verb in the first sentence of the Abstract.

In response, the Applicants have deleted the paragraph number and amended the first sentence of the Abstract in accordance with the Examiner's suggestion to include the requisite verb. Accordingly, the Applicants respectfully request that the objection to the Abstract be withdrawn.

## **B. Trademarks**

The Examiner objects to the Specification for allegedly failing to properly denote trademarks used therein. In response, the Applicants have amended paragraphs [0002], [0004], [0043], [0047], [0049], [0051], [0056], [0063], as indicated above, in order to properly denote trademarks used therein.

Specifically, the Specification has been amended to capitalize all trademarks used therein and to provide the generic terminology for the goods or services to which each of the trademarks refers. Accordingly, the Applicants respectfully request that the objection to the Specification be withdrawn.

## **III. OBJECTION TO THE CLAIMS**

### **A. Claims 10, 11, 23 and 24**

The Examiner objects to claims 10, 11, 23 and 24. Specifically, the Examiner alleges that claims 10 and 11 are duplicates of each other, and that claims 23 and 24 are also duplicates of each other. In response, the Applicants respectfully submit that claims 10 and 11 and claims 23 and 24 are not duplicates.

Specifically, claims 10 and 23 recite (in a method and in a system, respectively) “enabling customization in a deployment environment”, while claims 11 and 24 recite (in a method and in a system, respectively) “enabling customization in a development environment”. Accordingly, the Applicants respectfully request that the objection to claims 10, 11, 23 and 24 be withdrawn.

### **B. Claims 22-25**

The Examiner objects to claims 22-25. Specifically, the Examiner alleges that claims 22-25 lack commas after the recitation of their respective parent claim numbers. In response, the Applicants have amended claims 22-25 to include the requested commas. Accordingly, the Applicants respectfully request that the objection to claims 22-25 be withdrawn.

**IV. REJECTION OF CLAIMS 14-31 UNDER 35 U.S.C. §101****A. Claims 14-25**

The Examiner objects to claims 14-25 under U.S.C. §101, for being allegedly directed to non-statutory subject matter. Specifically, the Examiner alleges that claims 14-25 contain “means-plus-function” limitations, but that the Specification fails to disclose a corresponding structure. In response, the Applicants have cancelled claim 16 without prejudice. The remainder of the rejection is respectfully traversed.

Specifically, the Applicants submit that a corresponding structure is disclosed at least in FIG. 14 and the description thereof (i.e., paragraphs [0098]-[00103]). For instance, the central processor 1416 of the system illustrated in FIG. 14 is a “means for designating a customizable element of a set” and a “means for compiling the customizable element”, as recited in independent claim 14. Moreover, the central processor 1416 is also a “means for parsing a set” (as recited in claim 16), a “means for customizing” (as recited in claim 17), a “means for designating a ruleset” (as recited in claim 21), a “means for generating a customized ruleset” (as recited in claim 22), a “means for enabling customization” (as recited in claims 23 and 24) and a “means for re-editing a previously generated rule” (as recited in claim 25).

The Applicants therefore submit that the specification does disclose a structure corresponding to the “means-plus-function” limitations of claims 14-15 and 17-25. Accordingly, the Applicants respectfully request that the rejection of claims 14-15 and 17-25 under U.S.C. §101 be withdrawn.

**B. Claims 26-31**

The Examiner objects to claims 26-31 under U.S.C. §101, for being allegedly directed to non-statutory subject matter. Specifically, the Examiner alleges that claims 26-31 “recite nothing but the physical characteristics of a form of energy”. In response, the Applicants have cancelled claim 28 without prejudice. The remainder of the rejection is respectfully traversed.

Claims 26-27 and 29-31 recite computer-readable media for storing software instructions for customizing a rule-based application. As the Supreme Court has recognized, Congress chose the expansive language of 35 USC §101 so as to include

"anything under the sun that is made by man" as statutory subject matter. *Diamond v. Chakrabarty*, 447 U.S. 303, 308-09, 206 USPQ 193, 197 (1980) (MPEP 2106, emphasis added). The Applicants respectfully submit that computer-readable media, including acoustic or light waves carrying instructions that are readable by a processor, are made by man and are not naturally occurring phenomena. Accordingly, the Applicants respectfully submit that the subject matter to which claims 26-27 and 29-31 is drawn is patentable, and, as such respectfully request that the rejection of claims 26-27 and 29-31 under U.S.C. §101 be withdrawn.

## **V. REJECTION OF CLAIMS 1-31 UNDER 35 U.S.C. §102**

The Examiner rejects claims 1-31 as being anticipated under 35 U.S.C. §102(e) by the Grindrod patent (U.S. Patent No. 6,868,413, issued March 15, 2005, hereinafter referred to as "Grindrod"). In response, the Applicants have amended independent claims 1, 14 and 26 in order to more clearly recite aspects of the present invention. Claims 3, 16 and 28 have been cancelled without prejudice.

The Examiner's attention is respectfully directed to the fact that Grindrod fails to teach or suggest the novel invention of parsing a set to detect customizable elements that are designated as a customizable templates, as recited in Applicants' amended independent claims 1, 14 and 26.

By contrast, the cited portion of Grindrod at most teaches that a business logic application processes the conditions of a given business rule in order to determine if the conditions have been met (i.e., such that a specified action is triggered). That is, the business logic application is given an existing business rule, and evaluates the conditions of the rule in order to determine which actions (if any) to take. Grindrod does not teach, in the course of authoring a ruleset, parsing a set in order to detect customizable elements or templates in the set.

Thus, Grindrod fails to teach or suggest parsing a set to detect customizable elements designated as customizable templates, as recited by Applicants' claims 1, 14 and 26. Specifically, Applicants' claims 1, 14 and 26 positively recite:

1. A method of customizing a rule-based application, the method comprising: designating a customizable element of a set as a customizable template;

compiling said customizable element into at least one object to form a ruleset; and

parsing said set to detect said customizable element designated as a customizable template. (Emphasis added)

14. A system for customizing a rule-based application, the system comprising:  
means for designating a customizable element of a set as a customizable template;

means for compiling said customizable element into at least one object to form a ruleset; and

parsing said set to detect said customizable element designated as a customizable template. (Emphasis added)

26. A computer-readable media for storing software instructions for customizing a rule-based application, which when executed by a processor perform the steps of:

designating a customizable element of a set as a customizable template;  
compiling said customizable element into at least one object to form a ruleset; and

parsing said set to detect said customizable element designated as a customizable template. (Emphasis added)

Since Grindrod fails to teach or suggest parsing a set to detect customizable elements designated as customizable templates, Grindrod does not teach or suggest each and every element of Applicants' claims 1, 14 and 26. Moreover, dependent claims 2-13, 15-25 and 27-31 depend, either directly or indirectly, from independent claims 1, 14 and 26 and recite additional features. As such, and for at least the exact same reason set forth above, the Applicants submit that claims 2, 4-13, 15, 17-25, 27 and 29-31 are also not anticipated and are allowable.

Therefore, Applicants contend that claims 1-2, 4-15, 17-27 and 29-31 are patentable over Grindrod and, as such, fully satisfy the requirements of 35 U.S.C. §102. Thus, Applicants respectfully request that the rejection of claims 1-2, 4-15, 17-27 and 29-31 under 35 U.S.C. §102 be withdrawn.

## VI. CONCLUSION

Thus, the Applicants submit that all of the presented claims fully satisfy the requirements of 35 U.S.C. §101 and 35 U.S.C. §102. Consequently, the Applicants believe that all of these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the issuance of a final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

3/29/07

Patterson & Sheridan, LLP  
595 Shrewsbury Avenue  
Shrewsbury, New Jersey 07702

  
\_\_\_\_\_  
Kin-Wah Tong, Attorney  
Reg. No. 39,400  
(732) 530-9404